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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN  
BROADBENT; GINA ROHBOCK; NOLAN  
BARLOW; JASON BLACK; MAY MUSSER;  
HOLLY BISTLINE; LAWRENCE BARLOW;  
STEVEN DOCKSTADER; MARVIN COOKE;  
HELEN BARLOW; VERGEL BARLOW;  
CAROLE JESSOP; BRIELL LIBERTAE  
DECKER f/k/a, LYNETTE WARNER; AMY  
NIELSON; SARAH ALLRED; THOMAS  
JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION  
OF MARVIN COOKE**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Marvin Cooke, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.
2. I am a Plaintiff in the above-captioned matter.
3. I make these statements based on my own knowledge and belief.
4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my trial testimony on September 26, 2022.
5. Based on my fraud claim against Warren Jeffs, I estimate that I suffered the following damages.
6. Over my working life, I donated \$8,000,000 of flooring products and supplies to the FLDS Church. At first, my donations were voluntary, but after Warren Jeffs took control in 1998, I had no choice and my donations were forced. I conservatively estimate that \$4,500,000 of the \$8,000,000 was provided to Warren Jeffs due to his fraud. As a result, I claim \$4,500,000 in damages for lost flooring products and supplies.
7. In addition to the flooring supplies, I provided my own personal labor to Warren Jeffs through the time I was expelled in December 2012 without charge. This was in addition to the free labor I was required to give him through my flooring businesses. At trial, I stated that the free and forced labor I provided to Warren Jeffs would be in the millions of dollars, but I do not have any way of providing exact figures. Upon further reflection, for purposes of this Damages Declaration, I conservatively claim \$700,000 as the value of the labor that Warren Jeffs obtained from me by fraud.
8. In coming to these estimates, I have included the work I did for ATI Construction, Inc., a church controlled company, where I provided flooring and was also involved in marketing and obtaining funds for church business plans. I have also included the special construction projects

done for the benefit of Jeffs at night. These special flooring projects were for a majority of the properties in the Short Creek area.

9. After I was expelled on December 4, 2012, I found it extremely difficult to work because of the trauma I experienced. I have lost wages estimated at \$100,000 a year for 10 years. I reach that estimate based on the minimum I would have earned without also working late into the night. Accordingly, I claim lost wage damages in the amount of \$1,000,000.

10. I have operated flooring businesses for the benefit of Warren Jeffs and provided my personal labor for him day and night but I have not been part of work crews that lived in housing and had food and utilities provided by the FLDS Church.

11. I paid for the materials to build the homes my family lived in. I also built my home with my own labor and the help of others and in turn I also helped others build their homes. I always paid for the utilities, repairs and maintenance on my homes. I also paid all of the property taxes. Based on that, I do not consider my housing to have been provided by Warren Jeffs or the FLDS Church.

12. While Warren Jeffs led the FLDS, my 36 family members' medical needs were generally addressed at the FLDS controlled Hildale Clinic which billed medicaid or medicare for services provided. Any medical or dental bills that were not covered by medicaid or medicare were paid by me.

13. When my family and I were part of the United Order during the last year I was in the FLDS, my earnings were taken by Warren Jeffs, but we did have access to the Bishop's Storehouse for food, clothing and other necessities. All of those basic necessities (and more) would have been

provided directly by me (as was our housing) but we were instructed to access only the storehouse and to use only what food and other necessities the storehouse had to offer. Regardless, I estimate the value of the necessities I received that year at \$300 a month or \$3,600 for that year, which amount may be deducted from my economic damages at the discretion of the Court.

14. Therefore, I claim economic damages in the total amount of at least  $(\$4,500,000 + 700,000 + 1,000,000 - 3,600)$  \$6,196,400.

15. In terms of my general or non-economic damages, I tried to testify at trial about what I went through and continue to go through personally, including the loss I have suffered as if 36 members of my family had flown into the side of a cliff. Although that did not literally happen and many of my family members have now left the FLDS, neither they nor I are the same people. In many ways it is as if we have all died, in many ways we remain dead to each other, and I mourn each loss every day. I ask for general damages in the amount of at least \$1,000,000.

16. I estimate that my total economic and non-economic damages are at least \$7,196,400  $(\$6,196,400 + \$1,000,000)$ .

17. Finally, I request an award of punitive damages in an amount equal to my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.

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